

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977
Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738
Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970
Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978
Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al.,
 No. 04-CV-1923
New York Marine, et al. v. Al Qaida, et al., No. 04-CV-6105
World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., No. 04-CV-07280

**DEFENDANTS WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA
AND WORLD ASSEMBLY OF MUSLIM YOUTH INTERNATIONAL RULE**
26(a)(1) INITIAL DISCLOSURES

Defendants World Assembly of Muslim Youth Saudi Arabia (“WAMY”) and World Assembly of Muslim Youth International (“WAMY International”), by and through their undersigned counsel, make the following initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1). These initial disclosures are based on information reasonably available to Defendants as of the date hereof. The disclosures herein are provided without prejudice to the rights of Defendants to identify additional witnesses or evidence. Further, Defendants reserve the right to supplement these initial disclosures. The inclusion of documents in this disclosure statement shall not be construed as a waiver of:

- (1) The attorney-client privilege and/or the work-product doctrine, either generally or as they attach to particular documents; or
- (2) The admissibility of these documents in this case.

I. Individuals with Relevant Discoverable Information

Defendants identify the following individuals who may have relevant discoverable information:

1. Saleh Al-Wohaibi, Secretary General of WAMY, 2002 to present
Address: Can be reached through undersigned counsel
Subject: Ran WAMY Saudi Arabia's activities during this time period
2. Dr. Manih ibn Hammad al Junahi, Former Secretary General of WAMY, 1986-2002
Address: Saudi Arabia
Subject: Ran WAMY Saudi Arabia's activities during this time period
3. Dr. Tawfeeq ibn Ahmed al Qusayyer, Former Secretary General of WAMY, 1981-1986
Address: Unknown
Subject: Ran WAMY Saudi Arabia's activities during this time period
4. Dr. Ahmad Abdul Qadir Bahafidhalla, Former Secretary General of WAMY, 1978-1981
Address: Unknown
Subject: Ran WAMY Saudi Arabia's activities during this time period
5. Dr. Abdul Hameed Abu Soliman, Former Secretary General of WAMY, 1973-1978
Address: Unknown
Subject: Ran WAMY Saudi Arabia's activities during this time period
6. Fadel Soliman, Former Youth Director of WAMY International.
Address: Jeddah, Saudi Arabia
Subject: Ran WAMY U.S. operations including Hajj group and chaplaincy
7. Ibrahim Abdullah, Former Officer, WAMY International
Address: Egypt
Subject: Ran WAMY U.S. operations
8. Anwar Hajjaj, Director, WAMY International
Address: Can be reached through undersigned counsel
Subject: Ran WAMY U.S. operations
9. Abdullah Binladin, Founder, WAMY International
Address: Can be reached through his counsel in this litigation
Subject: Founded WAMY International in 1992

II. Categories and Location of Relevant Documents

Defendant provides the following description, by category and location, of all documents, electronically stored information and tangible things in possession, custody, or control that they may use to support their defenses.

1. Documents related to WAMY International's corporate formation documents, financial statements, bank accounts, invoices, IRS letters and annual reports
2. Correspondence between the Saudi Government and WAMY regarding antiterrorism policy
3. Correspondences between WAMY and WAMY International.
4. Documents related to WAMY's humanitarian relief work in connection with Red Cross and Red Crescent
5. Documents related to WAMY International's office space lease
6. Letters of appreciation for WAMY and WAMY International from various individuals and institutions
7. Documents related to Hajj tours provided by WAMY International
8. WAMY's religious literature and religious audio tapes
9. WAMY's manual on "Islamic Camps: Objectives, Program Outlines, Prepatory Steps."
10. Affidavit of Saleh Al-Wohaibi, October 30, 2005 (already produced in this litigation)
11. Correspondence of Fadel Soliman to the U.N. Economic and Social Council (ECOSOC) of May 19, 2003
12. U.N. Economic and Social Council Committee on Non-Governmental Organizations Publication listing applicants for consultative status of February 7, 2003
13. Correspondence between WAMY and Adel Batterjee of February 26, 1993 (already produced in this litigation)
14. Documents related to lack and refusal of service on WAMY and WAMY International by *Burnett* Plaintiffs (already produced in this litigation)

15. Correspondences between the Law Firm of Omar T. Mohammedi, LLC and Plaintiffs' counsel regarding deficient service by *Burnett* Plaintiffs (already produced in this litigation)

All of the aforesaid documents are located in the following addresses:

Law Firm of Omar T. Mohammedi
233 Broadway, Suite 801
New York, NY 10279

III. Computation of Damages

Defendants have not asserted a claim for damages against any other party in this action.

IV. Insurance

At the present time, Defendants are not aware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a judgment that may be entered in this action, or to indemnify or reimburse payments made to satisfy such a judgment.

Dated: October 15, 2010

Respectfully submitted,

/s/Omar T. Mohammedi
Omar T. Mohammedi, Esq.
Law Firm of Omar T. Mohammedi, LLC
Woolworth Building
233 Broadway, Suite 801
New York, NY 10279
*Attorneys for World Assembly of Muslim Youth
Saudi Arabia and World Assembly of Muslim Youth
International*

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2010, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 of June 16, 2004.

/s/Omar T. Mohammedi
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